215 South Cascade Street PO Box 496 Fergus Falls, Minnesota 56538-0496 218 739-8200 www.otpco.com (web site)

# VIA FAX and OVERNIGHT DELIVERY

March 18, 2005

Ms. Pamela Bonrud, Executive Director South Dakota Public Utilities Commission State Capitol 500 East Capitol Street Pierre, SD 57501-5070



Re: Amendment to the petition of Otter Tail Corporation d/b/a Otter Tail Power Company to revise its Fuel Adjustment Clause Tariff to accommodate MISO Day 2 charges, SDPUC Docket No. EL05-009

Dear Ms. Bonrud,

Pursuant to Administrative Rules of South Dakota ("ARSD") Part 20:10:01:16, enclosed for filing please find an original and 10 copies of an Amendment to Otter Tail Corporation d/b/a Otter Tail Power Company's, petition for approval of revisions to its Fuel Adjustment Clause (FAC) tariff to accommodate MISO Day 2 charges.

Otter Tail Power Company is requesting its original petition be amended to allow net accounting through FERC account 555 (purchased power).

Should you have any questions with respect to this filing, please contact me at (218) 739-8289 or <a href="mailto:bbrutlag@otpco.com">bbrutlag@otpco.com</a>.

Very truly yours,

Bernadeen Brutlag

Manager, Regulatory Services

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Enclosures

# STATE OF SOUTH DAKOTA BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

In the Matter of the petition of Otter Tail Corporation d/b/a Otter Tail Power Company, to revise its Fuel Adjustment Clause Tariff to accommodate MISO Day 2 charges.

Docket No. EL05-009

Amendment to the Petition of Otter Tail Power Company to Revise its Fuel Adjustment Clause Tariff to Accommodate MISO Day 2 Charges

## I. INTRODUCTION

Pursuant to Administrative Rules of South Dakota ("ARSD") Part 20:10:01:16, Otter Tail Corporation d/b/a Otter Tail Power Company ("Otter Tail"), proposes an amendment to its petition to the South Dakota Public Utilities Commission ("the Commission") for approval of revisions to its Fuel Adjustment Clause ("FAC") tariff. The amendment will allow the use of net accounting through FERC Account 555 (purchased power) instead of the accounts proposed in the original filing.

#### II. GENERAL FILING INFORMATION

Pursuant to ARSD Part 20:10:01:02.3, Otter Tail provides the following general information.

# A. Name, Address, and Telephone Number of Utility.

Otter Tail Power Company 215 South Cascade Street P. O. Box 496 Fergus Falls, MN 56538-0496 (218) 739-8200

## B. Name, Address, and Telephone Number of Utility Attorney.

Bruce Gerhardson , Associate General Council Otter Tail Corporation 215 South Cascade Street P. O. Box 496 Fergus Falls, MN 56538-0496 (218) 998-7108

## C. Date of Filing.

This amendment is being filed on March 18, 2005.

## G. <u>Title of Utility Employee Responsible for Filing.</u>

Bernadeen Brutlag Manager, Regulatory Services Otter Tail Power Company 215 South Cascade Street P. O. Box 496 Fergus Falls, MN 56538-0496 (218) 739-8289

# III. BACKGROUND AND REQUEST

In its original filing Otter Tail requested use of a variety of FERC accounts. Since Otter Tail filed the original petition, both Xcel Energy (Xcel) EL05-008 and Montana Dakota Utilities (MDU) EL05-007 have filed for tariff revisions to their fuel adjustment clauses to allow the handling of MISO Day 2 charges. Both Xcel and MDU have requested the ability to use net accounting through FERC account 555 – Purchased Power Expense. Xcel has also requested the same accounting treatment in Minnesota and it appears Otter Tail will also be required to use the net accounting approach in Minnesota. Both Xcel and MDU have requested the net accounting approach in North Dakota. Otter Tail has agreed to use net accounting in North Dakota if the North Dakota Public Service Commission prefers that approach. In the interest of consistency for both the South Dakota Public Utilities Commission and Otter Tail itself (across the jurisdictions it serves), Otter Tail requests a Commission Order directing net accounting through FERC account 555.

## IV. CONCLUSION

For the foregoing reasons, Otter Tail respectfully requests that the Commission approve the proposed amendment to its original petition for revisions to its FAC tariff (Docket EL05-009), to be effective as of same date at the original petition.

Dated: March 18, 2005

Respectfully submitted,

Otter Tail Corporation d/b/a
OTTER TAIL POWER COMPANY

By:\_

Bernadeen Brutlag Manager, Regulatory Services Otter Tail Power Company 215 South Cascade Street P. O. Box 496 Fergus Falls, MN 56538-0496 (218) 739-8289

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